ENVIROCARE of Utah, Inc.

RADIOACTIVE WASTE PROFILE RECORD

EC-0230, Revision 4

A. GENERATOR AND WASTE STREAM INFORMATION

GENERAL: Complete this form for one waste stream. Contact Envirocare at (801) 532-1330 if you have any questions while completing this form. Please indicate "N/A" if a category does not apply.

1. GENERATOR INFORMATION

Generator Name: US DOE Mound EPA ID #: OH6890008984

Generator Contact: Gayle Shockey Title: Waste Coordinator

Mailing Address: P.O. Box 3030, 1 Mound Road,

Miamisburg, OH 45343 Utah Site Access Permit #:

Phone: (937) 673-7861 Fax:(937) 865-4380 Email: shocgc@doe-md.gov

Contractor Name: CH2M Hill Mound Location of Material (City, State): Miamisburg, OH

Name & Title of Person Completing Form: Gayle Shockey Phone: (937) 673-7861

2. WASTE STREAM INFORMATION

Waste Stream ID: 8005-02 Waste Stream Name: Mound Soils

Revision: 20 Date: August 25,2005 Volume (ft^3): 3,300,000 Delivery Date: August 2005

CHECK APPROPRIATE BOXES BELOW. Please verify the required forms requested below are completed and submitted with the Radioactive Waste Profile Record.

HAZARDOUS MATERIAL: Is the waste classified as hazardous waste as defined by 40 CFR 261?

Y ☐ N ☒ If No, complete and attach the "Low-Level Radioactive Waste Analysis Certification Attachment".

If Yes, complete and attach the "Hazardous Waste Analysis Certification Attachment" and check applicable box below.

Has the waste been treated to meet applicable treatment standards per 40 CFR 268? Y ☐ N ☒

Is the waste to be treated by Envirocare? Y ☐ N ☒

LOW-LEVEL RADIOACTIVE MATERIAL: Is the radioactivity contained in the waste material Low-Level Radioactive Waste as defined in the Low-Level Radioactive Waste Policy Amendments Act of 1985 or in DOE Order 435.1?

Y ☒ N ☐ If Yes, a current copy of a LLRW Compact Export letter authorizing export must be submitted if applicable. This authorization is applicable for non-DOE LLRW (i.e., Mixed Waste, NORM/NARM, 11e.(2) material, and waste from DOE do not require a Compact Export Letter).

If No, check appropriate box: NORM/NARM ☐ 11e.(2) Byproduct Material ☐ Other:

SPECIAL NUCLEAR MATERIAL: Does the waste stream contain material with uranium enriched in U-235 or any of the following radionuclides: U-233, Pu-236, Pu-238, Pu-239, Pu-240, Pu-241, Pu-242, Pu-243, or Pu-244?

Y ☒ N ☐ If Yes, complete and attach the "SNM Exemption Certification" form (EC-0230-SNM). Supporting statements, analytical results, and documentation must be included with the submittal.

PCB MATERIAL: Does the waste contain Polychlorinated Biphenyls (PCB's) that are regulated for disposal per 40 CFR 761?

Y ☐ N ☒ If Yes, complete and attach the "PCB Waste Certification" form (EC-98279).

ASBESTOS: Does the waste contain Asbestos Containing Material?

Y ☐ N ☒ If Yes, Asbestos Containing Material must be managed in accordance with 40 CFR 61. Provide a detailed description of the waste containing asbestos in Section B.5 of the waste profile.

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B. WASTE PHYSICAL PROPERTIES & PACKAGE INFORMATION

1. GENERAL CHARACTERISTICS

Does the waste contain free liquids? Y ☐ N ☒ If Yes, what is the percent of free liquid by waste volume? <1 %

Does the waste contain absorbent? Y ☒ N ☐ Density range of the waste: 65 – 120 S.G. ☐ lb/ft3 ☒

List percentage of waste type by volume: Soil 83% Concrete & Metal 15% DAW 2% Resins 0% Sludge 0%

Other constituents and percentage by volume? Primarily debris from building demolition

2. MATERIAL SIZE

Gradation of Material: Indicate the percentage of waste material that would pass through the following grid sizes. For example, 95% of the material would pass through a 12" square, 90% passes through a 4" square, 80% passes through a 1" square, etc.

12" 100 % 4" 90 % 1" 83 % 1/4" 83 % 1/40" 70 % 1/200" 50 %

Does the waste stream contain oversize debris (i.e., no dimension < 10 inches and any dimension > 12 feet)? Y ☐ N ☒
If Yes, include a detailed description (i.e., weight, size, drawings, etc.) of the oversize debris in the narrative of Section B.5.

3. MOISTURE CONTENT

For soil or soil-like materials, please use **Std. Proctor Method ASTM D-698** to determine the optimum moisture content. The waste material must not exceed 3 percentage points above optimum moisture upon arrival at Envirocare's disposal facility unless approved by Envirocare.

Optimum Moisture Content: 13.4 % at Maximum Dry Density (lb/ft^3): 117

Average Moisture Content: 15.7 % Moisture Content Range: 11.8% - 20.9%

4. WASTE SHIPPING & PACKAGING

Transportation Mode: ☒ Highway ☒ Rail

Shipping & Container Packages: (Check all that apply) ☒ Drums (≤ 85 gallons) ☒ Boxes (≤ 100 ft^3) ☐ Soft-Sided Bags (≤ 10 yd^3)

☒ Intermodal ☒ Sealand ☒ Gondola* ☐ Box Car

Other: in load wrapper with gondola lid if appropriate

*Dimensions of gondola railcars must be between 48 to 56.5 feet in length and 8.5 to 12.5 feet in height as measured from the top of the rail to the top of the railcar unless approved by Envirocare.

5. NARRATIVE DESCRIPTION AND HISTORY OF WASTE

Please submit a narrative description and history of the waste as an attachment to the Radioactive Waste Profile Record. This attachment should include the following:

- Process that generated the waste
- Waste material physical composition and characteristics
- Radiological and chemical characterization method
- Basis for determining manifested radionuclide concentrations
- Description and amounts of absorbents, if applicable
- Basis of non-hazardous or hazardous waste determinations
- Treatment processes, if applicable
- Product information or Material Safety Data Sheets associated with the waste as applicable
- Information requested in other sections of this form

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C. RADIOLOGICAL INFORMATION

Obtain sufficient samples to adequately determine a range and weighted average of activity in the waste. Attach the gamma spectroscopy or radiochemistry data supporting the radionuclide information listed below.

1. Does the waste material contain accessible surfaces with contact dose rates greater than 500 mR/hr? Y ☐ N ☒

2. Does the waste material contain any of the following isotopes: Aluminum-26, Berkelium-247, Calcium-41, Californium-249, Californium-250, Chlorine-36, Rhenium-187, Terbium-157, or Terbium-158? Y ☐ N ☒

3. Please list the following information for each isotope associated with the waste. The manifested concentration on the Uniform LLRW Manifest Form 541 must not exceed the upper concentration range listed below for each isotope. Provide an explanation in the narrative description of Section B.5 if the waste contains localized "hot spots" or elevated concentrations that significantly exceed the upper concentration range. Envirocare's license assumes that short-lived decay products of specified isotopes are present in concentrations equal to the parent. Consequently, these short-lived isotopes do not need to be listed below. If additional space is needed, provide an Attachment C.3 to this profile record formatted as below.

Isotopes	Manifested Concentration Range (pCi/g)			Weighted Avg. per Container (pCi/g)	Isotopes	Manifested Concentration Range (pCi/g)			Weighted Avg. per Container (pCi/g)
Ac-227	nd	to	15,000	50.0			to		
Am-241	nd	to	100	2.0			to		
H-3	nd	to	100,000	50.0			to		
Co-60	nd	to	1,000	5.0			to		
Cs-137	nd	to	5,000	2.0			to		
Sr-90	nd	to	100	1.0			to		
Ra-226	nd	to	8000	15			to		
Pu-238	nd	to	9,100	400.0			to		
Pu-239	nd	to	500	20.0			to		
Pu-240	nd	to	500	15.0			to		
Pu-241	nd	to	500	5.0			to		
Th-228	nd	to	1,000	50.0			to		
Th-230	nd	to	7000	10.0			to		
Th-232	nd	to	1,000	50.0			to		
U-234	nd	to	500	4.0			to		
U-235	nd	to	100	0.5			to		
U-238	nd	to	500	5.0			to		
U-233	nd	to	300	1.0			to		
Th-229	nd	to	200	1.0			to		
Pb-210	nd	to	7000	15			to		
Bi-207	nd	to	400	2.0			to		
Bi-210	nd	to	400	2.0			to		
Pa-231	nd	to	100	1.0			to		
Bi-210m	nd	to	400	5.0			to		
Ag-108m	nd	to	400	5.0			to		
		to					to		
		to					to		
		to					to		

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HAZARDOUS WASTE ANALYSIS CERTIFICATION ATTACHMENT

This form is required only if the checkbox for Hazardous Material on page one has been checked YES. Envirocare may waive the chemical laboratory analyses if the material is not amenable to chemical sampling and analysis (e.g., debris items including metal pieces, concrete, plastic, etc.). Justification for waiving the chemical analyses must be provided in Section B.5.

D. MINIMUM REQUIRED CHEMICAL ANALYSIS

The following parameters must be analyzed by a Utah or NELAC certified laboratory. Typical SW-846 analytical methods have been listed. Other approved methods are acceptable. Attach the most recent or applicable chemical analytical results representing the waste.

1. GENERAL CHEMICAL PARAMETERS

	SW-846 Analytical Methods
Soil pH:_____	**Method 9045** Please provide the range of the pH analyses performed.
PFLT:_____ Pass / Fail	**Method 9095** Not applicable for liquid radioactive waste streams.
Reactive Sulfide:_____ mg/kg	**Method 9034**
Reactive Cyanide:_____ mg/kg	**Method 9014** If the Reactive Cyanide is > 50 mg/kg , total and amenable cyanide are required.
	Method 9010 Total cyanide:_____ mg/kg Amenable cyanide:_____ mg/kg
TOX:_____ mg/kg	**Method 9020** TOX or Method 8260 & 8270 analyses (totals). If TOX >200 mg/kg, Method 8260 & 8270 analyses (totals) are required.

Has the waste been analyzed for volatile or semi-volatile constituents (Method 8260 or 8270)? Y ☐ N ☐

Any distinguishing color or odor? Y ☐ N ☐ If Yes, color: _____; odor:

2. HAZARDOUS WASTE CODES AND TREATMENT STANDARDS (40 CFR 268)

List all hazardous waste codes and treatment standards. Include hazardous waste codes that have been removed through treatment and indicate "Former" in the second column. Worst-case concentrations only need to be provided for concentration based treatment standards. If additional space is needed, provide an Attachment D.2 to this profile record formatted as below. Include a description of hazardous waste determinations and any variances, exclusions, etc. in the narrative requested in Section B.5.

EPA HW Codes	Description, Constituent of Concern, or Subcategory	Treatment Standard (mg/kg unless noted as mg/L TCLP or Technology Code)	Worst-Case Concentration (mg/kg unless noted as mg/L TCLP)

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D. 2. HAZARDOUS WASTE CODES AND TREATMENT STANDARDS (Continued)

EPA HW Codes	Description, Constituent of Concern, or Subcategory	Treatment Standard (mg/kg unless noted as mg/L TCLP or Technology Code)	Worst-Case Concentration (mg/kg unless noted as mg/L TCLP)

3. UNDERYLYING HAZARDOUS CONSTITUENTS (40 CFR 268.48)

List all underlying hazardous constituents (UHCs) and treatment standards. Include UHCs that have been removed through treatment. Worst-case concentrations only need to be provided for concentration based treatment standards. If additional space is needed, provide an Attachment D.3 to this profile record formatted as below.

Underlying Hazardous Constituents	Treatment Standard (mg/kg unless noted as mg/L TCLP or Technology Code)	Worst-Case Concentration (mg/kg unless noted as mg/L TCLP)

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D. 4. OTHER CHEMICAL CONSTITUENTS

List any other chemical constituents of concern (e.g., PCBs, chelating agents, etc.) and worst-case concentrations. If additional space is needed, provide an Attachment D.4 to this profile record formatted as below.

Other Chemical Constituents	Worst Case Concentration (mg/kg unless noted as mg/L TCLP)	Other Hazardous Constituents	Worst-Case Concentration (mg/kg unless noted as mg/L TCLP)

5. LABORATORY CERTIFICATION INFORMATION

☐ **UTAH or NELAC CERTIFIED**
The Utah or NELAC certified laboratory holds a current certification for the applicable chemical test methods insofar as such official certifications are given. Please provide a copy of the laboratory's current certification letter for each parameter analyzed and each method used for chemical analyses required by this form.

☐ **OTHER LABORATORY CERTIFICATION** (Describe below)

6. CERTIFICATION

I certify that sample results representative of the waste described in this profile were or shall be obtained using state- and EPA-approved analytical methods. I also certify that where necessary representative samples were or shall be provided to Envirocare and to qualified laboratories for the analytical results reported herein. I further certify that the waste described in this record is not prohibited from land disposal in 40 CFR 268 (unless prior arrangements are made for treatment at Envirocare) and that all applicable treatment standards are clearly indicated on this form. I also certify that the information provided on this form is complete, true, and correct and is accurately supported and documented by any laboratory testing as required by Envirocare. I certify that the results of any said testing have been submitted to Envirocare. I certify that the waste does not contain any prohibited items listed in Envirocare's Radioactive Material License or RCRA Permit.

Generator's Signature: Gayle C. Shockey Title: Waste Management Date: August 25, 2005

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LOW-LEVEL RADIOACTIVE WASTE CERTIFICATION ATTACHMENT

This form is required only if the checkbox for Hazardous Material on page one has been checked No. Envirocare may waive the chemical laboratory analyses if the material is not amenable to chemical sampling and analysis (e.g., debris items including metal pieces, concrete, plastic, etc.). Justification for waiving the chemical analyses must be provided in Section B.5.

D. MINIMUM REQUIRED CHEMICAL ANALYSIS

The following parameters must be analyzed by a Utah or NELAC certified laboratory. Typical SW-846 analytical methods have been listed. Other approved methods are acceptable. Attach the most recent or applicable chemical analytical results representing the waste.

1. GENERAL CHEMICAL PARAMETERS

	SW-846 Analytical Methods
Soil pH: 2.5-11.1	**Method 9045** Please provide the range of the pH analyses performed.
PFLT: pass Pass / Fail	**Method 9095** Not applicable for liquid radioactive waste streams.
Reactive Sulfide: 11.0 mg/kg	**Method 9034**
Reactive Cyanide: 0.5 mg/kg	**Method 9014**

2. 40 CFR 261.24 Table 1 – Contaminants of Toxicity Characteristic

Metals plus Zinc: Methods 6010 & *7470 (Envirocare's GWQDP requires zinc analysis) ☒ TCLP (mg/L) or ☐ Total (mg/kg)

Arsenic see Rev 0	Chromium see Rev 0	Selenium see Rev 0
Barium see Rev 0	Lead see Rev 0	Silver see Rev 0
Cadmium see Rev 0	*Mercury see Rev 0	Zinc see Rev 0

Organics, Pesticides/Herbicides: Methods 8081/8151 ☐ TCLP (mg/L) or ☐ Total (mg/kg)

Endrin see Rev 0	Toxaphene see Rev 0	Chlordane see Rev 0
Lindane see Rev 0	*2,4-D see Rev 0	Heptachlor see Rev 0
Methoxychlor see Rev 0	*2,4,5-TP Silvex see Rev 0	

Organics, Semi-Volatile: Method 8270 ☐ TCLP (mg/L) or ☐ Total (mg/kg)

o-Cresol see Rev 0	Hexachlorobenzene see Rev 0	Pentrachlorophenol see Rev 0
m-Cresol see Rev 0	Hexachlorobutadiene see Rev 0	Pyridine see Rev 0
p-Cresol see Rev 0	Hexachloroethane see Rev 0	2,4,5-Trichlorophenol see Rev 0
Total Cresol see Rev 0	Nitrobenzene see Rev 0	2,4,6-Trichlorophenol see Rev 0
2,4-Dinitrotoluene see Rev 0		

Organics, Volatile: Method 8260 ☐ TCLP (mg/L) or ☐ Total (mg/kg)

Benzene see Rev 0	1,4-Dichlorobenzene see Rev 0	Methyl ethyl keytone see Rev 0
Carbon Tetrachloride see Rev 0	1,2-Dichloroethane see Rev 0	Tetrachloroethylene see Rev 0
Chlorobenzene see Rev 0	1,1-Dichloroethylene see Rev 0	Trichloroethylene see Rev 0
Chloroform see Rev 0		

3. Was the waste at the point of generation a RCRA hazardous waste per 40 CFR 261? Y ☐ N ☒

If Yes, list former hazardous waste codes and former underlying hazardous constituents. List worst-case concentrations for each hazardous constituent. If additional space is needed, provide an Attachment D.3 to this profile record formatted as below. Attach the most recent chemical analytical results demonstrating compliance with applicable treatment standards.

If No, indicate "N/A" in Section D.3 below.

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D. 3.	Former EPA HW Codes or Underlying Hazardous Constituents	Treatment Standard (mg/kg unless noted as mg/L TCLP or Technology Code)	Worst Case Concentration (mg/kg unless noted as mg/L TCLP)
	na	na	na
	na	na	na
	na	na	na
	na	na	na
	na	na	na
	na	na	na

4. OTHER CHEMICAL CONSTITUENTS

List any other chemical constituents of concern (e.g., PCBs, chelating agents, etc.) and worst-case concentrations. If additional space is needed, provide an Attachment D.4 to this profile record formatted as below.

Other Chemical Constituents	Worst-Case Concentration (mg/kg unless noted as mg/L TCLP)	Other Hazardous Constituents	Worst-Case Concentration (mg/kg unless noted as mg/L TCLP)
na	na	na	na
na	na	na	na
na	na	na	na
na	na	na	na
na	na	na	na
na	na	na	na

5. LABORATORY CERTIFICATION

☒ **UTAH or NELAC CERTIFIED**
The Utah or NELAC certified laboratory holds a current certification for the applicable chemical test methods insofar as such official certifications are given. Please provide a copy of the laboratory's current certification letter for each parameter analyzed and each method used for chemical analyses required by this form.

☐ **OTHER LABORATORY CERTIFICATION** (Describe below)

na

6. CERTIFICATION

I certify that sample results representative of the waste described in this profile were or shall be obtained using state- and EPA-approved analytical methods. I also certify that where necessary representative samples were or shall be provided to Envirocare and to qualified laboratories for the analytical results reported herein. I further certify that the waste described in this record is not prohibited from land disposal in 40 CFR 268 (unless prior arrangements are made for treatment at Envirocare) and that all applicable treatment standards are clearly indicated on this form. I also certify that the information provided on this form is complete, true, and correct and is accurately supported and documented by any laboratory testing as required by Envirocare. I certify that the results of any said testing have been submitted to Envirocare. I certify that the waste does not contain any prohibited items listed in Envirocare's Radioactive Material License.

Generator's Signature: Gayle C. Shockey Title: Waste Coordinator Date: August 25, 2005

Low-Level Radioactive Waste Certification Attachment

B.5 Narrative

Summary

Mound has over 3,000,000 cubic feet (>1,300 gondolas) of soil and debris as a part of the completion of waste management actions at the Mound closure. The soils and debris result from various remediation actions throughout the facility. The general nature of the waste is soil with up to 17% Envirocare conforming debris. The waste is generally loaded into open top low-sided gondola cars with load wrappers. Occasionally, cars may be lidded as appropriate. The 17% debris is not necessarily distributed throughout each car. Some cars may have none while others could be up to 100% debris. The 17% is for the profile overall and will be determined and controlled by operations personnel at the consolidation facility and monitored by Envirocare.

The project is organized into discrete activities with project teams generating the wastes and transferring (both physically and for responsibility) to a centralized waste management group. For risk management, cost control, and efficiency the centralized waste management group operates intermediate staging facilities for waste to perform consolidation, packaging, verification, and shipping activities for disposal. The largest of these facilities is the soil staging area.

The Mound Waste Management Plan is used as a waste management "acceptance" program for waste transfer from the generator to the consolidation area. Criteria for radiological, chemical, and physical characteristics are contained in the procedure. This revision of the 8005-02 Envirocare profile depicts some of the important changes in waste preparation and review methods and controls. Each project is governed by Work Packages which contain determinations for waste handling and disposition.

About 1,000,000 cubic feet of soil and debris material has been stockpiled for packaging and transport. This profile describes the nature of this waste stockpile. Waste is received daily as it is generated by the various projects. Several projects dominate the volume contribution to the waste inventory. These projects may generate material of differing compositions. It is impractical to blend all of the material into one physically uniform waste stream given the availability of real estate and the production schedules. Therefore, the waste shipped under this profile will change in physical form from time to time depending on logistical and schedule issues. These changes will be managed, controlled and communicated with Envirocare to assure appropriate waste handling.

Additionally, it is impractical to always manage the moisture content of this waste stream to maintain a level < 3% above optimum moisture of the soil. Some waste is expected to be "wet" waste upon receipt by Envirocare.

Process

Generators are required to characterize the waste for management by the centralized waste management group. Approaches are developed together by the generators and waste management to assure appropriate regulation, compliance and management. These are necessarily driven at the project level and determined by the material and the actions at the remediation/decommissioning site.

Radiological and Hazardous Classification: The waste segregation at the generation point provides broad segregation for Radiological and Hazardous classifications. All of the waste in this waste stream

is classified as non-RCRA Hazardous and conforms to the defined ranges of radionuclide distribution contained in this profile.

Waste Operations are designed for cost control, efficiencies and compliance verification in packaging and disposal. They are not designed for waste processing or treatment. Minimal physical character alterations are conducted in the waste operations areas.

Control and Communications:

Given the likelihood of variations in moisture content and optimum moisture content of the waste over the duration of the project Mound will perform the following.

1. Moisture content of each railcar will be determined and recorded.
2. Optimum moisture content will be routinely determined by Proctor Testing to monitor variations in soil characteristics.
3. This information will be summarized and will be transmitted to Envirocare.

Physical classification

Both soil and debris are managed under this profile.

Debris

The debris will conform to the "debris" definition for Envirocare Waste Acceptance. Oversized debris is excluded from this waste stream. The generators are advised to perform any sizing operations required. The size limitations are evaluated upon receipt at the waste facilities. Some material is contained in the stockpile which does not meet the criteria; however this is segregated and sized prior to packaging.

Generally, debris is segregated during the loading phase of the operations. The debris is visually inspected by the staging and loading operators and worked into the gondolas to optimize packaging efficiencies. As stated earlier this is controlled at the time of loading, cars will have differing percentages of debris but will average less than 17% over the entire profile. If required, cars may be loaded with mostly debris and soil added to increase weight. Typically, these cars will have lids.

Soil

The physical properties of this profile are premised on the stockpiled blend of material and are applicable to the general waste as received from the various projects, blended, and worked by the stockpile loading operations. The properties are described in the profile. The sampling and analysis of the waste to determine optimum moisture content is described in the next section. Mound personnel are monitoring the moisture content of the waste on a car by car level.

Specific projects may have differing physical properties. Depending on the magnitude of the differences, generation and receipt rates, and the blending abilities at the loading area, these project wastes may be blended with the stockpile or managed separately. Waste management personnel will base these decisions on analytical data from the projects and other factors affecting waste operations.

Modifications to Radionuclide Concentrations

Several radionuclides have been removed from Section C of Profile 8005-02, Rev. 15, due to their extremely low concentrations in relation to the major isotopes reported. The upper concentration value for several other isotopes has been raised to more accurately reflect the radiological characteristics of the wastes coming from a specific project at Mound, the R/SW building debris and soils. The only weighted average per container value that has been changed is that for tritium, which has been raised to account for the inclusion of the R/SW waste streams in the overall profile volume.

PRS 11 Soils

Data from VOA and SVOA, TCLP, shows no "hits" above characteristic regulatory levels. The matrix is soils.

Data from VOA and SVOA totals shows elevated amounts of TCE at 260 ppm (trichloroethene) and toluene at 320 ppm.

To date, no process knowledge that specifically details the history of this contamination has been found. No information regarding the source of these two contaminates has been located or determined to otherwise be available. There are general statements in various "clean up" and investigation documents that pertain to the site as a whole that TCE was used at the site as a solvent, but no documentation specifically states that any spent solvents of TCE or toluene were disposed of at PRS 11.

As a result, no waste codes appear applicable to this material as it is exhumed.